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## <u>REMARKS</u>

Claims 17 and 19-22 are presented for consideration, with Claims 17, 19 and 20 being independent.

The independent claims have been amended to further distinguish Applicant's invention from the cited art. Support for the claim amendments can be found, for example, in Figure 5 and the corresponding specification on page 18, line 10, *et. seq.* 

All of the claims stand rejected under 35 U.S.C. §103 as allegedly being obvious over Moore '039 in view of Okubo (JP '516). This rejection is respectfully traversed.

Applicant's invention as set forth in Claim 17 relates to a method of rendering an image comprising a plurality of overlapping graphic objects. The method includes the steps of generating a list of input edges in accordance with a plurality of boundaries of the plurality of overlapping graphic objects, wherein some of the input edges are overlapping, producing a list of non-intersecting edges from the list of input edges on a per-scan-line basis, and rendering the image based on the produced list of non-intersecting edges. As amended, the non-intersecting edges form a plurality of boundaries of a plurality of non-overlapping graphic objects that are visually equivalent to the plurality of overlapping graphic objects. Claim 17 has been amended to recite that at least one non-intersecting edge replaces a plurality of overlapping input edges, with the non-intersecting edge being shared by more than one non-overlapping graphic object.

In accordance with Claim 17 of Applicant's invention, a high performance and efficient method of rendering an image can be provided.

The primary citation to <u>Moore</u> relates to a method and apparatus for generating instructions for a directed adjacency graph, such as an expression tree, into a raster pixel image

having a plurality of scan lines and a plurality of pixel locations on each line. <u>Moore</u> is relied on for providing an image rendering method that includes steps of receiving an image representation and generating a list of input edges.

The secondary citation to <u>Okubo</u> is directed to an image processing apparatus that is relied on for producing non-intersecting edges and rendering the image based on the generated non-intersecting edges. <u>Okubo</u> is also said to teach that non-intersecting edges form boundaries of non-overlapping graphic objects that are visually equivalent to the overlapping graphic objects.

Without conceding to the propriety of combining <u>Moore</u> and <u>Okubo</u> in the manner proposed in the Office Action, it is submitted that such a combination still fails to teach or suggest Applicant's invention as set forth in Claim 17. For example, Claim 17 recites, among other features, that at least one non-intersecting edge replaces a plurality of overlapping input edges, with the non-intersecting edge being shared by more than one non-overlapping graphic object. Neither <u>Moore</u> nor <u>Okubo</u> teach or suggest replacing overlapping input edges in this manner.

Accordingly, it is submitted that Applicant's invention as set forth in Claim 17 is patentable over the cited art.

Claims 19 and 20 relate to an apparatus for rendering an image, and a computer readable medium storing a computer program, respectively, and have been amended along the same lines as Claim 17. These claims thus also provide that at least one non-intersecting edge replaces a plurality of overlapping input edges, where the non-intersecting edge is shared by

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more than one non-overlapping graphic object. Claims 19 and 20 are therefore submitted to be

patentable for at least the same reasons discussed above.

Accordingly, reconsideration and withdrawal of the rejection of the claims under 35

U.S.C. §103 is respectfully requested.

Thus, it is submitted that Applicant's invention as set forth in independent Claims 17,

19 and 20 is patentable over the cited art. In addition, dependent Claims 21 and 22 set forth

additional features of Applicant's invention. Independent consideration of the dependent claims

is respectfully requested.

Due consideration and prompt passage to issue are respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by

telephone at (202) 530-1010. All correspondence should continue to be directed to our below-

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Respectfully submitted,

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